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September 18, 2002

Via Electronic Filing

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW-B204
Washington, DC 20554

Re: *Notice of Ex Parte Presentation*: Numbering Resource Optimization, CC Docket
No. 99-200.

Dear Ms. Dortch:

On Monday, September 16, Robert Quinn Jr. and I met with William Maher, Bureau Chief of the Wireline Competition Bureau, Deena Shetler, Deputy Division Chief of the Pricing Policy Division of the Wireline Competition Bureau, Jay Atkinson and Chris Barnekov of the Wireline Competition Bureau to discuss AT&T's Petition for Reconsideration of the Commission's *Third NRO Order*¹. AT&T emphasized that the size of the exogenous cost changes for Thousand Block Number Pooling ("TBNP") significantly exceed the original expectations set by much of the language contained in the *Third NRO Order*. We discussed the apparent inconsistencies between the *First NRO Order*², which indicated that cost recovery should be similar to that used in the local number portability proceedings and the *Third NRO Order*, which expresses the opposite view that numbering administration is inherently access-related and should be recovered as such³. We stated that the current system for recovery of these costs violates both Section 254(e) and 251(e) (2) of the Communications act. Section 251(e) requires the Commission to remove subsidies from access charges, and Section 251(e)(2) requires numbering administration costs to be recovered from all telecommunicaions carriers in a competitively neutral manner. We also noted that no party opposed AT&T's petition and that WorldCom supported the petition and urged the Commission to take immediate action consistent with its petition.

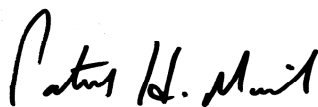
¹ *In the Matter of Numbering Resource Optimization*, 17, FCC Rcd 4784 (2002) ("*Third NRO Order*")

² *Numbering Resource Optimization*, 15 FCC Rcd 7574, Para. 193 (2000) ("*First NRO Order*")

³ *Third NRO Order*, *Supra*, Para. 34.

Consistent with the Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick H. Munit". The signature is fluid and cursive, with the first name "Patrick" being more prominent.

cc: William Maher
Deena Shetler
Jay Atkinson
Chris Barnekov